

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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March 14, 2025

**BY ECF**

The Honorable Richard M. Berman  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

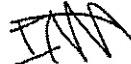
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Re: United States v. Bonilla  
24 Cr 590 (RMB)

Dear Judge Berman:

I write with the consent of Pretrial Services and the Government to respectfully request that Pretrial Services be permitted to remove Mr. Bonilla's GPS bracelet on days it is required for his surgery preparation (e.g., MRIs) and for the surgery itself. Mr. Bonilla and Pretrial will work in unison to ensure that the bracelet is removed only when necessary and promptly re-applied. Thank you for the Court's consideration.

Respectfully submitted,

/s/   
\_\_\_\_\_  
Ian Marcus Amelkin  
Assistant Federal Defender  
52 Duane Street, 10th Floor  
New York, NY 10007  
(212) 417-8733

cc: AUSA James Madilk, Esq.

Application granted.

SO ORDERED:

Date: 3/19/25

  
Richard M. Berman, U.S.D.J.